

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES)
v.) M.J. No 04-850-MBB
JOHN CHU)
ZHU ZHAOXIN)

GOVERNMENT'S MOTION TO SEAL

Now comes the United States of America, by its attorneys,
Michael J. Sullivan, United States Attorney for the District of
Massachusetts, and Gregory Moffatt and Michael D. Ricciuti,
Assistant U.S. Attorneys, and hereby moves to seal the criminal
complaint, supporting affidavit and any other records in this
case until further order of this Court. As grounds, the
government states that disclosure of this investigation and of
the information contained in these documents would be contrary to
the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

GREGORY MOFFATT
MICHAEL D. RICCIUTI
Assistant U.S. Attorneys

Marianne B. Bowler, USMS

May 6, 2004. Allowed.